

**REMARKS**

This amendment is filed in response to the Office action dated September 18, 2008, along with a three-month extension of time, and a formal Interview Request. All rejections and objections are respectfully traversed.

Claim 14 was cancelled without prejudice.

No Claims were added.

Claims 1-13, 15-20 and 24-26 are in the case.

Claims 1, 16, 20, 24, 25, and 26 were amended to better claim the invention.

**Request for Interview**

The Applicant respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The Applicant may be reached at 617-951-2500.

At Paragraph 5 of the Office Action Claims 1-3, 6, 12-17, 20, and 24-26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Becker-Szendy et al. U.S. Patent No. 7,243,089 issued July 10, 2007, in view of Kazar et al. U. S. Patent No. 6,868,417 issued March 15, 2005.

Applicant's claimed invention, as set out in representative claim 1, comprises in part:

1. A system comprising:
  - a plurality of network resources adapted to process received block-based protocol data access requests; and
  - a plurality of one or more virtual servers* each comprising a logical partitioning of the network resources to establish an instance of a multi-protocol server configured to service the block-based data access requests by converting the block-based protocol requests to appropriate file system data requests, each virtual server allowed shared access to resources of the file system; and
  - a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system.*

Becker-Szendy discloses a file system in which a plurality of clients share access to resources of a file system.

Kazar discloses a file system in which both file level and block level clients have remote access to a server, and the server stores data from both the file level and the block level clients as files.

Applicant respectfully urges that neither Becker-Szendy nor Kazar disclose Applicant's claimed novel

*a plurality of one or more virtual servers . . . a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system.*

Becker-Szendy discloses a file system with a plurality of clients, where the clients share resources of the file system. However, Becker-Szendy has no disclosure of Applicant's claimed *a plurality virtual servers*. Further, Becker-Szendy has no disclosure of Applicant's claimed novel *a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system.*

Also, Kazar has no disclosure of Applicant's claimed

*a plurality of virtual servers . . . a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system.*

The disclosure of Kazar is of a file system which accepts data from both file level and block level clients, however Kazar has no disclosure of Applicant's claimed *a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the*

*file system*, and further has no disclosure of Applicant's claimed *a plurality of virtual servers*.

Accordingly, Applicant respectfully urges that the cited Becker-Szendy and Kazar patents, either taken singly or in combination, are legally incapable of rendering Applicant's claimed invention unpatentable under 35 U.S.C. 103(a) because of the absence from each of Applicant's claimed *a plurality of virtual servers . . . a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system*.

#### **SUPPORT FOR CLAIM AMENDMENTS**

The clauses of Applicant's claimed invention in representative Claim 1 are supported in the Specification as:

Lines 4-8 of claim 1:

"a plurality of ~~one or more~~ virtual servers each comprising a logical partitioning of the network resources to establish an instance of a multi-protocol server configured to service the block-based data access requests by converting the block-based protocol requests to appropriate file system data requests, each virtual server allowed shared access to resources of the file system."

Are supported by the Specification at Page 4 lines 6-8, which state:

“The present invention relates to an architecture that provides the ability to create and maintain multiple instances of virtual servers, such as virtual filers (vfilers), within a storage system that supports block-based protocols.”

And are further supported by the Specification at Fig. 5, and Page 15 line 11 – Page 17 line 17, and at other locations.

Claim 1 at lines 9-12, which state:

“a context data structure provided to each virtual server, the context data structure including information pertaining to a security domain of the virtual server for each supported access protocol, to enable controlled access to the shared resources of the file system.”

Are fully supported by the Specification at Page 4 Lines 22-24, which state:

“Each vfiler is provided a vfiler context data structure including, among other things, information pertaining to a unique and distinct security domain of the vfiler (for each supported access protocol) to thereby enable controlled access to allocated and shared resources of the vfiler.”

And are further supported by the Specification at Fig. 5, and Page 17 line 18 – Page 18 line 11, and in other locations.

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims.

Applicant respectfully solicits favorable action

Please charge any additional fee occasioned by this paper to our Deposit Account  
No. 03-1237.

Respectfully submitted,

/A. Sidney Johnston/  
A. Sidney Johnston  
Reg. No. 29,548  
CESARI AND MCKENNA, LLP  
88 BLACK FALCON AVENUE  
BOSTON, MA 02210  
Telephone: (617) 951-2500  
Facsimile: (617) 951-3927